

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

---

DMITRIY SHIROKOV, on behalf of himself  
and all others similarly situated

Plaintiff,

v.

DUNLAP, GRUBB & WEAVER, PLLC; US  
COPYRIGHT GROUP; THOMAS DUNLAP;  
NICHOLAS KURTZ; GUARDALEY, LIMITED;  
and ACHTE/NEUNTE Boll Kino  
Beteiligungs Gmbh & Co KG,

Defendants.

---

Case: 1:10-cv-12043-GAO

**DEFENDANTS DUNLAP, GRUBB & WEAVER, PLLC’S, THOMAS DUNLAP’S, AND  
NICHOLAS KURTZ’S RENEWED MOTION FOR SANCTIONS PURSUANT TO FED.  
R. CIV. P. RULE 11**

---

Defendants Dunlap, Grubb & Weaver, PLLC, Thomas Dunlap, and Nicholas Kurtz respectfully submit this renewed motion for sanctions pursuant to Federal Rule of Civil Procedure Rule 11 in relation to Plaintiff’s First Amended Complaint. As grounds, the moving Defendants submit the accompanying memorandum of law.

Wherefore, the moving Defendants respectfully request that the Court impose appropriate sanctions pursuant to Federal Rule of Civil Procedure Rule 11 against Plaintiff, Dmitriy Shirokov, and his counsel, Booth Sweet LLP, Daniel G. Booth, and Jason E. Sweet, including but not limited to the striking of the plaintiff’s claims in their entirety or alternatively against Defendants Dunlap Grubb & Weaver, PLLC, Thomas Dunlap and Nicholas Kurtz, as well as

reimbursement of the attorneys' fees and expenses Defendants have incurred, and for such other further relief that the Court deems just and proper.

The Defendants,  
Dunlap, Grubb & Weaver, PLLC,  
Thomas Dunlap, and Nicholas Kurtz  
By their counsel,

/s/ Kara Thorvaldsen

---

George C. Rockas BBO# 544009  
Kara Thorvaldsen BBO# 660723  
WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP  
260 Franklin Street  
Boston, MA 02110  
(617) 422-5300

**Certificate Of Service**

I, Kara Thorvaldsen, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). I am not aware of any party who is not a registered participant, and therefore electronic filing is the sole means of service of this document.

/s/ Kara Thorvaldsen